

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

JANET LEIGH FRANKLIN,

Plaintiff,

v.

MBNA CORP,

Defendant.

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C.A. No. 04-1513 GMS

TRIAL BY JURY DEMANDED

MOTION FOR SUMMARY JUDGMENT

**REDACTED**

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/Teresa A. Cheek

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Attorneys for Defendant

Dated: August 2, 2006

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

JANET LEIGH FRANKLIN,

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MOTION FOR SUMMARY JUDGMENT

Defendant, by and through its undersigned counsel, hereby moves for entry of an Order granting it Summary Judgment on all Counts of Plaintiff's Complaint for the reasons more fully set forth in its Opening Brief, filed herewith.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Teresa A. Cheek

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Attorneys for Defendant

Dated: August 2, 2006

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
The Honorable Gregory M. Sleet  
United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2006, I electronically filed a true and correct copy of the foregoing Motion for Summary Judgment - Redacted and this Certificate of Service with the Clerk of the Court using CM/ECF.

I further certify that on August 2, 2006, I served the foregoing Motion for Summary Judgment- Redacted and this Certificate of Service on the following non-registered participant in the manner indicated below:

Janet L. Franklin, *Pro se* (First Class Mail)  
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Dated: August 2, 2006